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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

U.S. DISTRICT COURT  
EASTERN DISTRICT-WI  
FILED

2009 NOV -4 A 10:48

UNITED STATES OF AMERICA

JON W. SANFILIPPO, CLERK  
MAIL-REC'D

Plaintiff,

v.

Case No. 09-CR-196

DERRICK AVERY and

SHAMIKA EVANS

AMENDED BOND HEARING AND AFFIDAVIT

NOWCOMES Defendant Derrick Avery, hereby moves this Honorable Court to schedule a Bond Hearing based on the following factors set forth below:

(1.) The Defendant is not a flight risk.

(2.) The Defendant has ties to the community and has organized events for disadvantaged children-providing them with bookbags and school supplies.

(3.) Has been in the Entertainment industry from 1984 till the present.

(4.) From 2001 to 2003 Avery successfully Completed Probation and Parole.

(5.) I have successfully completed all therapeutic and psychiatric therapy.

(6.) I have voluntarily participated in community activism.

(7.) I have professionally and successfully built my Entertainment Company. Including opening a home for exploited children "Mardani's best Kept Secret". The interview was broadcast by radio in Las Vegas - to open by August or September 2009.

(8.) Has been a positive impact to the children in the community.

(9.) In 2004 I moved to Las Vegas, NV but, still continued my efforts of contributing to such events such as Afro-fest - Juneteenth and Vam for Peace. I have continued to bring only the best Entertainers to Milwaukee.

(10.) In 2006 I opened a shoe store.

(11.) I continued to Legitimately and positively influence the Community.

(12.) I pointedly explained to the youth, legitimate and viable business ventures to steer them away from crime by being an example of a positive successful role model.

(13.) On or about April 1, 2004 I was recording with "Big E" a music producer at his studio as a featured Artist.

(14.) At that time I was living in Las Vegas.

(15.) I returned to Milwaukee in 2006 for the Grand Opening of Mardani Clothing & Shoes.

(16.) Then in 2007 I opened up "Mardani's Night Club".

(17.) This Corporation was to be passed down to my children, Malania Avery and Derrick Avery Jr. once they reached the Age of 18.

(18.) Prior to my incarceration I organized a youth stop-the-violence teen picnic scheduled for July 25th of 2009 at Lincoln Park and a stop-the-violence-save-our-youth dance of later that evening.

(19.) Since 2007 I have been in compliance with my bond in Nevada. I supplied the IRS and FBI with all requested documents and I have had no police contact.


I Derrick Avery being duly sworn state that the foregoing Affidavit is true and correct. Pursuant to Under Oath <sup>ss</sup> 1746.

## CERTIFICATE OF SERVICE

I, Derrick Avery mailed the foregoing Motion to:

Office of the Clerk  
517 E. Wisconsin Ave  
Milwaukee, WI 53202

This 2nd day of November 2009

Respectfully,  
Derrick Avery Sr.  


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